UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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MASQ MARKETING, INC.

Plaintiff,

12 Civ. 4717 (DLC)

-against-

RENUEN CORPORATION,
BELVEDERE GLOBAL STRATEGIES,
PRINCETON CORPORATE SOLUTIONS
and JAMES SCOTT BROWN,

NOTICE OF MOTION TO
DISMISS AMENDED COMPLAINT

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PLEASE TAKE NOTICE that upon the annexed Memorandum of Law, dated October 4, 2012, the affidavit of James Scott Brown, dated August 18, 2012, the amended complaint, and all papers and proceedings had herein, defendant James Scott Brown will move this Court on October 25, 2012, or as soon thereafter as counsel may be heard, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order, pursuant to Rules 12(b)(2)&(6) of the Federal Rules of Civil Procedure, dismissing the third, fourth and fifth causes of action against defendant James Scott Brown on the grounds that plaintiff has failed to state a claim and this Court lacks personal jurisdiction over defendant, and for such other and further relief as this Court deems just and proper.

Dated: New York, New York October 4, 2012

Respectfully submitted,

____/s/___

Roland R. Acevedo (RA 8915) Scoppetta Seiff Kretz & Abercrombie 444 Madison Avenue, 30th fl. New York, New York 10022 (212) 371-4500

Counsel for Defendants

To: Andrew M. Ayers, P.C. 540 President Street, 3rd fl. Brooklyn, N.Y. 11215 (718) 568-0221

Counsel for Plaintiff